

UNITED STATES DISTRICT COURT  
DISTRICT OF NORTH DAKOTA

United States of America,	)	
	)	
Plaintiff,	)	Case No. 1:21-cr-00130
	)	
v.	)	
	)	
Jacob Bradley Demarais,	)	<b>MOTION TO MODIFY</b>
	)	<b>PRETRIAL RELEASE</b>
Defendant.	)	

[1] COMES NOW, Defendant, Jacob Bradley Demarais, by and through his attorney, Patrick Brooke, moves the Court to modify his pretrial release in the above-referenced case.

[2] The Court allowed Mr. Demarais to enroll and complete psychosexual related dysfunction inpatient treatment at Alpha Human Services in Minneapolis, Minnesota. *See* Doc. ID #24. He is currently eligible to attend outpatient treatment through Alpha Human Services while residing with his uncle, Mark Demarais in Coleraine, Minnesota. Alpha Human Services has approved him for the outpatient program pending approval from the Court.

[3] The undersigned has been in touch with Mr. Demarais' Pretrial Release Officer in Minnesota, Michael Alberts, who does not object to this request. He also indicated he spoke to the Probation/Pretrial Office in North Dakota who would have no objection with a transition to his uncle's residence. Mark Demarais has agreed to remove all firearms, ammunition, and internet devices (smart TV and iPad) prior to Mr. Demarais' arrival into his home.

[4] The proposed pretrial release date would commence as soon as possible. Mr. Demarais understands the serious consequences if he would fail to appear for any future proceeding, and respectfully requests the Court modify his pretrial release to allow him to reside with his uncle and attend the outpatient program.

Dated this 14<sup>th</sup> day of October, 2021.

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